

EXHIBIT A-2

U.S. Patent No. 9,508,207 – Ticketmaster LLC and Live Nation Worldwide, Inc.

Claim 1

Dynamic Ticket Systems LLC (“DTS”) provides evidence of infringement of claim 1 of U.S. Patent No. 9,508,207 (hereinafter “the ’207 patent”) by Ticket Master LLC (“Ticketmaster”) and Live Nation Worldwide, Inc. (“Live Nation”) (collectively “Defendants”). In support thereof, DTS provides the following claim charts.

“Accused Instrumentalities” as used herein refers to at least electronic ticketing and access control systems and all hardware and/or software used in the implementation of such systems including, but not limited to Ticketmaster’s SafeTix ticketing management system used by Live Nation. These claim charts demonstrate Defendants’ infringement by comparing each element of the asserted claims to corresponding components, aspects, and/or features of the Accused Instrumentalities. These claim charts are not intended to constitute an expert report on infringement. These claim charts include information provided by way of example, and not by way of limitation.


The analysis set forth below is based only upon information from publicly available resources regarding the Accused Instrumentalities, as Defendants have not yet provided any non-public information. An analysis of Defendants’ (or other third parties’) technical documentation and/or software source code may assist in fully identify all infringing features and functionality. Accordingly, DTS reserves the right to supplement this infringement analysis once such information is made available to DTS. Furthermore, DTS reserves the right to revise this infringement analysis, as appropriate, upon issuance of a court order construing any terms recited in the asserted claims.

DTS provides this evidence of infringement and related analysis without the benefit of claim construction or expert reports or discovery. DTS reserves the right to supplement, amend or otherwise modify this analysis and/or evidence based on any such claim construction or expert reports or discovery.

Unless otherwise noted, DTS contends that Defendants directly infringe the ’207 patent in violation of 35 U.S.C. § 271(a) by selling, offering to sell, making, using, and/or importing the Accused Instrumentalities. The following exemplary analysis demonstrates that infringement. Unless otherwise noted, DTS further contends that the evidence below supports a finding of indirect infringement under 35 U.S.C. §§ 271(b) and/or (c), in conjunction with other evidence of liability under one or more of those subsections. Each Defendant makes, uses, sells, imports, or offers for sale in the United States, or has made, used, sold, imported, or offered for sale in the past, without authority, or induces others to make, use, sell, import, or offer for sale in the United States, or has induced others to make, use, sell, import, or offer for sale in the past, without authority products, equipment, or services that infringe claim 1 of the ’207 patent, including without limitation, the Accused Instrumentalities.

Unless otherwise noted, DTS believes and contends that each element of each claim asserted herein is literally met through Defendants’ provision of the Accused Instrumentalities. However, to the extent that Defendants attempt to allege that any asserted claim element is not literally met, DTS believes and contends that such elements are met under the doctrine of equivalents. More specifically, in its investigation and analysis of the Accused Instrumentalities, DTS did not identify any substantial differences between the elements of the patent claims and the corresponding features of the Accused Instrumentalities, as set forth herein. In each instance, the identified feature of the Accused Instrumentalities performs at least substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.

To the extent the chart of an asserted claim relies on evidence about certain specifically-identified Accused Instrumentalities, DTS asserts that, on information and belief, any similarly-functioning instrumentalities also infringes the charted claim. DTS reserves the right to amend this infringement analysis based on other products made, used, sold, imported, or offered for sale by Defendants. DTS also reserves the right to amend this infringement analysis by citing other claims of the '207 patent, not listed in the claim chart, that are infringed by the Accused Instrumentalities. DTS further reserves the right to amend this infringement analysis by adding, subtracting, or otherwise modifying content in the "Accused Instrumentalities" column of each chart.

Claim #	Accused Instrumentalities
<p>1. A method of providing access to a premises comprising:</p>	<p>Ticketmaster practices and/or induces others to practice a method of providing access to a premises.</p> <p>As the world has shifted to mobile, fans use their mobile devices to unlock all kinds of access. Mobile phones have become boarding passes for planes, keys for cars and hotel rooms, and now with Ticketmaster's SafeTix™ encrypted tickets, smartphones are the new concert ticket.</p> <div data-bbox="493 540 913 1026">  </div> <p>Built on the Presence® digital ticketing and <u>venue access control platform</u>, SafeTix™ creates a secure digital ticket that is connected to the original purchaser's Ticketmaster account.</p> <p>The purchaser can easily transfer tickets to their show buddies using the built-in transfer system, and each recipient's SafeTix ticket will then be linked to their individual Ticketmaster account. For the first time in concert history, artists have the opportunity to get to know not only the ticket buyer, but every ticketholder at every show in a Ticketmaster venue.</p> <p>https://business.ticketmaster.com/business-solutions/ticketmasters-safetix-encrypted-tickets-protect-fans-and-provide-artists-with-greater-visibility-into-event-attendees/ - Accessed 5/23/2023</p>

creating a credential to be used to unlock an access control device;

Using the Accused Instrumentalities, Ticketmaster performs and/or induces others to perform the step of creating a credential to be used to unlock an access control device.

The Accused Instrumentalities are used to create a credential.

As the world has shifted to mobile, fans use their mobile devices to unlock all kinds of access. Mobile phones have become boarding passes for planes, keys for cars and hotel rooms, and now with Ticketmaster's SafeTix™ encrypted tickets, smartphones are the new concert ticket.



Built on the Presence® digital ticketing and venue access control platform, SafeTix™ creates a secure digital ticket that is connected to the original purchaser's Ticketmaster account. The purchaser can easily transfer tickets to their show buddies using the built-in transfer system, and each recipient's SafeTix ticket will then be linked to their individual Ticketmaster account. For the first time in concert history, artists have the opportunity to get to know not only the ticket buyer, but every ticketholder at every show in a Ticketmaster venue.

<https://business.ticketmaster.com/business-solutions/ticketmasters-safetix-encrypted-tickets-protect-fans-and-provide-artists-with-greater-visibility-into-event-attendees/> - Accessed 5/23/2023

Ticketmaster SafeTix

Partners who are selling events powered by Ticketmaster SafeTix and authorized to fulfill the tickets for fans will receive an encrypted token from the Order Management API. Ticketmaster SafeTix is a new technology that reduces the risk of ticket fraud from stolen or illegal counterfeit tickets, provides event owners with greater control over their tickets and visibility into the individual fans who attend their events.

After receiving the encrypted token from the Order Management API, partners will need to pass the token to the Ticketmaster Secure Entry SDK to render the tickets within their app. To learn more about Ticketmaster SafeTix click [here](#).

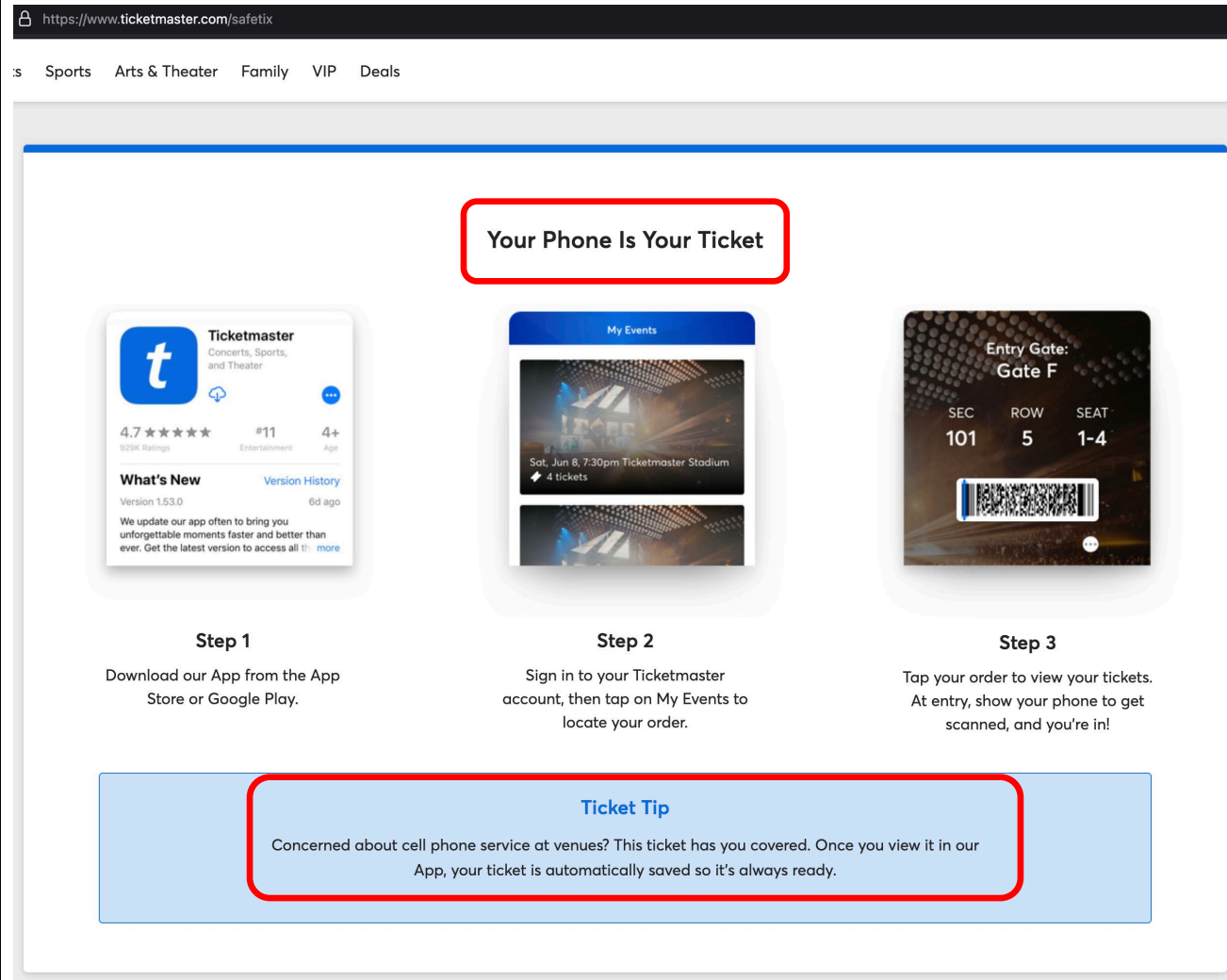
Partners will need to perform the following steps to integrate SafeTix:

- Integrate with Secure Entry SDK (iOS, Android, JavaScript) within your mobile web or app experience
- Pass a partner account ID for each unique user during checkout to associate the tickets with a partner account. (Partners should reuse the same account ID for each user).
- Call Order Management endpoint to retrieve the SafeTix Rotating Entry Token (RET) encrypted token
 - If Delayed delivery is ON: Communicate to the ticket buyer, they will be able to view their tickets on the specified date.
 - If Delayed delivery is OFF: Pass the encrypted token to the Secure Entry SDK to render the ticket.
- Continue to generate mobile and PDF tickets for non-Ticketmaster SafeTix events

https://developer.ticketmaster.com/products-and-docs/apis/partner/safetix/#partnert_api_integration – Accessed 6/29/2023

identifying a device to be used to present the credential to the access control device;

Using the Accused Instrumentalities, Ticketmaster performs and/or induces others to perform the step of identifying a device to be used to present the credential to the access control device.



<https://www.ticketmaster.com/safetix> - Accessed 5/23/2023

	<p><u>SafeTix uses new technology by tying a unique, identifiable digital ticket to your mobile phone</u> through an encrypted barcode that automatically refreshes every few seconds. It also includes NFC technology that will allow fans to enter venues through a simple "tap and go" experience at venue entrances. These enhancements protect against tickets being screenshotted or photocopied and sold multiple times by shady resellers.</p> <p>https://blog.ticketmaster.com/introducing-safetix-ticketmasters-next-gen-encrypted-tickets/ - Accessed 6/8/2023</p>
defining a dynamic link to provide the credential to the device;	<p>Using the Accused Instrumentalities, Ticketmaster performs and/or induces others to perform the step of defining a dynamic link to provide the credential to the device.</p> <p>https://www.ticketmaster.com/safetix - Accessed 5/23/2023</p> <div data-bbox="478 764 1770 1222"> <p>Why do you have SafeTix? ^</p> <p>How do SafeTix prevent counterfeiting? v</p> <p>Ticketmaster SafeTix are powered by a new and unique barcode that automatically refreshes every 15 seconds. This greatly reduces the risk of ticket fraud from stolen or illegal counterfeit tickets. If you take a closer look at your ticket, you may notice that it has a gliding movement, making it in a sense, alive. That movement is our ticket technology actively working to safeguard you every second.</p> <p>Can I still enter my event with a screenshot of my ticket? ^</p> </div> <p>https://help.ticketmaster.com/hc/en-us/articles/9641645631889-Find-My-Tickets - Accessed 5/23/2023</p>

4] Render the SafeTix encrypted token via the Secure Entry SDK

Overview:

- Pass Token to the Secure Entry SDK to render the Rotating Barcode

This integration applies to all digital tickets events that are enabled for SafeTix. The API will determine the event configuration, create the right token, and the SDK's will render the correct barcode.

<https://developer.ticketmaster.com/products-and-docs/apis/partner/safetix/> - Accessed 6/29/2023

2. Why do we need the barcode for SafeTix events?

The barcode is a required parameter for the SecureRender API. The barcode is returned in the * Order Management API* response. The barcode is used to determine if a valid ticket has been created before it generates the token. Partners are required to call Secure RenderAPI to refresh the SafeTix token and you pass the barcode in the request. The numerical value of the barcode does not change, the tokens changes.

3. What is the Device ID? This is a unique identifier specific to that device/app install. If you can't get the hardware number, then you should send a unique identifier from that app on that specific device. It can be a GUID that is sticky to that app install. The deviceId must be unique which helps Ticketmaster better combat fraud and improve security. An order-uuid while unique will not help us differentiate the devices enough as a user who has two devices and two applications installed would give us the same deviceId. This will not work for our SafeTix system.

https://developer.ticketmaster.com/products-and-docs/apis/partner/safetix/#partnert_api_integration – Accessed 6/29/2023

enabling the dynamic link by activating the link so that it is a valid link;

Using the Accused Instrumentalities, Ticketmaster performs and/or induces others to perform the step of enabling the dynamic link by activating the link so that it is a valid link.

Once the purchase is successfully completed, Ticketmaster will send the buyer the redemption URL. It is recommended that partners display it to the buyer. The URL is active until the buyer redeems the ticket. Partners can store the URL, however be advised that anyone who has the URL can redeem the ticket and could result in a customer service issue. Ticketmaster also sends reminders to the buyer until the ticket has been redeemed. Requesting a copy of the URL is not standard practice and we do not recommend relying on this as part of the integration process.

<https://developer.ticketmaster.com/products-and-docs/apis/partner/claim-flow/> - Accessed 6/29/2023

SafeTix Barcode

There are events that will have enforced SafeTix barcode. These barcodes/tickets can be viewed in the mobile web(browser) or the native app. Below is a comparison of both the flows.

<https://developer.ticketmaster.com/products-and-docs/apis/partner/claim-flow/> - Accessed 6/29/2023

Where can I view my ticket purchases?

If you bought your tickets online at [Ticketmaster.com](https://www.ticketmaster.com), they'll automatically appear in your account.

Ticketmaster app **[Ticketmaster.com](https://www.ticketmaster.com)**

1. Sign into your [My Account](#).
2. Tap **My Events**.
3. Tap on your event to view your seat locations, barcodes and more!

<https://ticketmaster-us.zendesk.com/hc/en-us/articles/9787464969873-Where-can-I-view-my-ticket-purchases-> Accessed 6/8/2023

Purchased tickets through one of our partner sites? First, claim your ticket from their site. Then once you've done that, you can manage your tickets from your My Account. Learn more by selecting one of the partners below:

Facebook

Bandsintown

Goldstar

**Team or Venue Account
Manager**

**Groupon or
G-Pass**

After your purchase, we'll send a confirmation of your purchase to the email address associated with your Facebook account. Click the link in the email to claim your Ticketmaster Verified tickets. You'll have to [sign in](#) or [create a Ticketmaster account](#) to claim your tickets.

You can also find confirmation of your purchase by going to your Facebook account's payment settings.

Don't have access to the email address associated with your Facebook account or need more help? Contact [Fan Support](#).

<https://ticketmaster-us.zendesk.com/hc/en-us/articles/9606198059409-I-can-t-find-my-order-in-my-account->
Accessed 6/8/2023

How does a ticket transfer work? Is it safe?

Yes, it's safe. When you transfer a ticket, the person you are sending the tickets to must accept the tickets in our secure marketplace. When they accept their ticket, we issue a new barcode to them. This keeps you protected and they get secure tickets they can trust.

How do I know if the tickets I've transferred have been accepted?



Once you transfer a ticket, you'll see one of two statuses. If you see "Waiting to accept," the recipient has not accepted your transfer yet. You may want to send them a reminder to check their email for the transfer notification. If you see "Accepted by," this means the recipient has accepted your tickets and they are no longer available for use in your account.

<https://www.ticketmaster.com/safetix> - Accessed 6/8/2023

presenting the credential to the access control device and to the identified device [via the dynamic link](#);

Using the Accused Instrumentalities, Ticketmaster performs and/or induces others to perform the step of presenting the credential to the access control device and to the identified device [via the dynamic link](#).

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https://developer.ticketmaster.com/products-and-docs/apis/partner/safetix/#partnert_api_integration – Accessed 6/29/2023

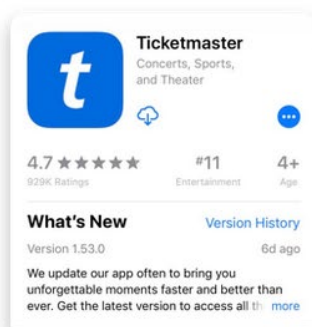
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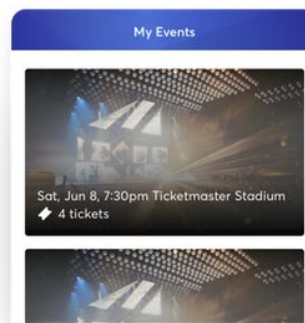
https://developer.ticketmaster.com/products-and-docs/apis/partner/safetix/#partnert_api_integration – Accessed 6/29/2023

Your Phone Is Your Ticket



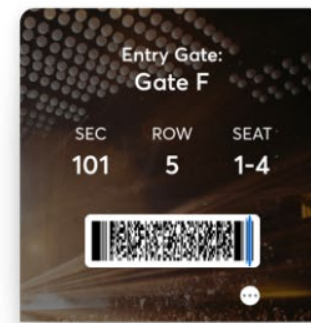
Step 1

Download our App from the App Store or Google Play.



Step 2

Sign in to your Ticketmaster account, then tap on My Events to locate your order.



Step 3

Tap your order to view your tickets. At entry, show your phone to get scanned, and you're in!

<https://www.ticketmaster.com/safetix> - Accessed 6/8/2023

How to scan SafeTix™

Does the ticket have a barcode?

YES



NO

Identify the antenna location on your scanner.



Janam XT3

Janam XT2 +/-



An Android's antenna may be at the top, middle or bottom of the phone.

Scan the ticket



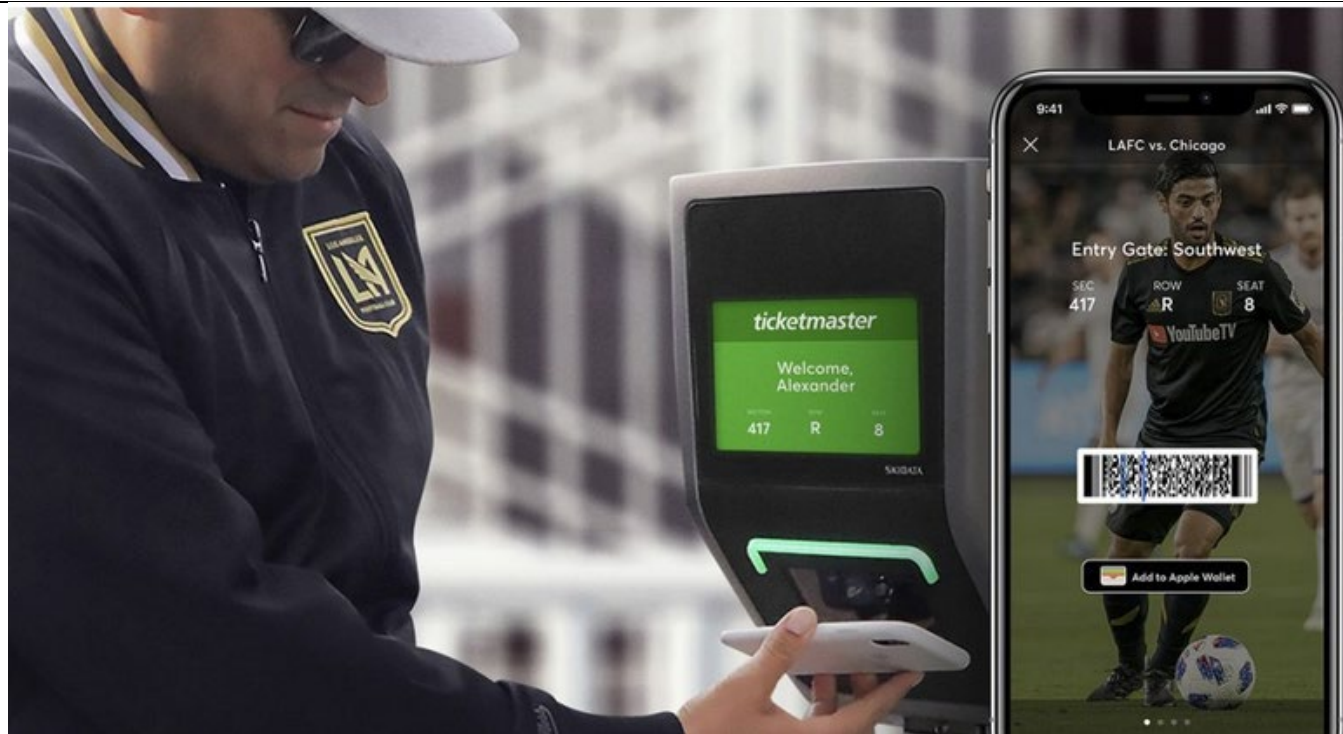
Validate the ticket

Hold the back of the scanner facing the fan and have them "tap to scan" near the correct antenna location.



ticketmaster®

<https://mktg.mlbstatic.com/dbacks/documents/2023/safetix.pdf> - Accessed 6/8/2023

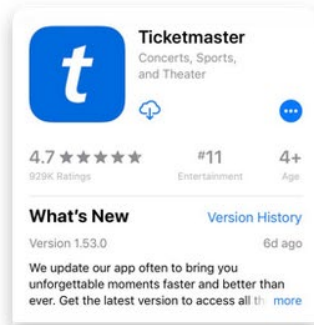


<https://blog.ticketmaster.com/introducing-safetix-ticketmasters-next-gen-encrypted-tickets/> - Accessed 6/8/2023

unlocking the access control device when the credential is presented by the identified device.

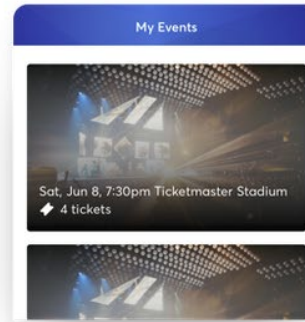
Using the Accused Instrumentalities, Ticketmaster performs and/or induces others to perform the step of unlocking the access control device when the credential is presented by the identified device.

Your Phone Is Your Ticket



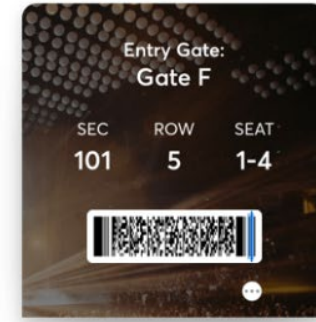
Step 1

Download our App from the App Store or Google Play.



Step 2

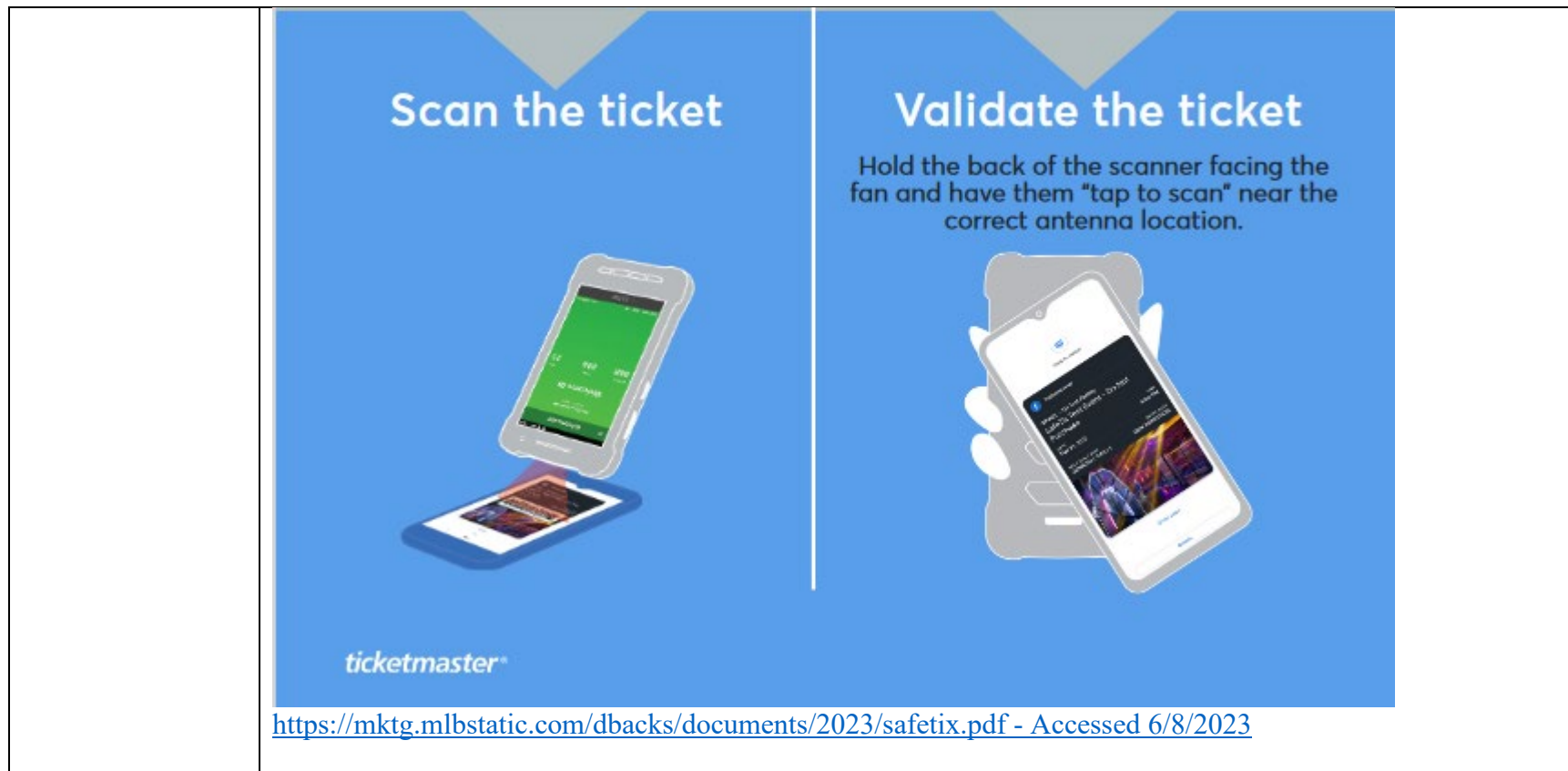
Sign in to your Ticketmaster account, then tap on My Events to locate your order.



Step 3

Tap your order to view your tickets. At entry, show your phone to get scanned, and you're in!

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Caveat: The notes and/or cited excerpts utilized herein are set forth for illustrative purposes only and are not meant to be limiting in any manner. For example, the notes and/or cited excerpts, may or may not be supplemented or substituted with different excerpt(s) of the relevant reference(s), as appropriate. Further, to the extent any error(s) and/or omission(s) exist herein, all rights are reserved to correct the same.